

REMARKS

Initially, Applicants wish to thank the Examiner for the detailed Final Office Action and for the Notice of References cited therein.

Claims 1 and 8 stand rejected under 35 U.S.C. §103(a) as being unpatentable over JUNG et al. (U.S. Patent No. 7,401,100), KIKUCHI et al. (U.S. Patent No. 5,870,523), and APTE et al. (U.S. Patent No. 6,269,373).

Upon entry of the present amendment, independent claim 1 will have been amended. More particularly, independent claim 1 will have been amended to address a minor grammatical informality. The amendments to independent claim 1 should not be considered an indication of Applicants' acquiescence as to the outstanding rejection. Applicants have amended independent claim 1 and to advance the prosecution and to obtain an early allowance of the present application.

Applicants respectfully traverse the outstanding rejection of claims 1 and 8 under 35 U.S.C. §103(a) as being unpatentable over the combination of JUNG et al., KIKUCHI et al. and APTE et al. Applicants' independent claim 1 recites, *inter alia*, a platform including a processor that executes native codes, the platform interpreting and executing predetermined codes by converting the predetermined codes into the native codes executable by the processor and causing the processor to execute the native codes for storing the designated plurality of images and the rendition time corresponding to each image in the storage, and including a native code for selecting an image to be rendered from among the plurality of images stored in the storage based on a specified location on a time axis relating to the playback timing of the video included in the control information, and the rendition time corresponding to each image stored in the storage, and storing the selected image in the image plane. Applicants' independent claim 1 also

recites, *inter alia*, a compositor that superimposes the selected image stored in the image plane on the video during playback of the video.

According to a non-limiting embodiment of the presently claimed invention, the claimed platform converts predetermined codes of a program into native codes (*i.e.*, machine language instructions) that are executable by the claimed processor. As will be understood by one of ordinary skill in the art, machine language codes are instructions and data executed directly by a central processing unit of a computing device and are considered a lowest-level representation of a compiled and/or assembled computer program. As will also be understood by one of ordinary skill in the art, native codes are machine language codes that are platform-dependent parts of language features or libraries; every processor or processor family has its own machine language code instruction set. Accordingly, images selected based on converting predetermined codes into native codes are selected at an increased speed, when compared with an interpreter that sequentially interprets and executes program codes (*i.e.*, higher level computer programming) for selecting images.

Applicants respectfully submit that JUNG discloses an interactive contents synchronizing unit 13 that interprets interactive contents, and determines whether to synchronize multimedia elements in the interactive contents with AV contents. *See, e.g.*, column 3, lines 56-64 and column 4, lines 16-24 of JUNG. Applicants further submit that JUNG discloses that the interactive contents synchronizing unit 13 transmits an API corresponding to an interactive control command received from a user to an AV contents reproducing engine 14 and a synchronized multimedia element reproducing engine 15, so that each of engines 14 and 15 reproduces the AV contents and the multimedia elements, respectively.

The Examiner acknowledges the combination of JUNG et al. and KIKUCHI et al. fails to disclose or render obvious a platform including a processor that executes native codes, the platform interpreting and executing predetermined codes by converting the predetermined codes into the native codes executable by the processor and causing the processor to execute the native codes, as recited in Applicants' independent claim 1. In this regard, the Examiner asserts APTE et al. as teaching the above-noted feature of Applicants' independent claim 1 in column 6, lines 46-57 and column 11, lines 30-53 of APTE et al.

Applicants respectfully submit that APTE et al. discloses enabling the transparent persistence of an object reference for a JavaBean as a container-managed field within a CORBA server. *See, e.g.*, column 2, lines 39-41 of APTE et al. The asserted portion of APTE et al. in column 6, lines 46-57 is submitted to disclose that server objects 402 contain actual business logic that is implemented using application programming interfaces that utilize java-defined Java database connectivity (JDBC) structured query language (SQL) database access interface, which provides uniform access to a wide range of relational databases. APTE et al. is further submitted to disclose that a Java compiler generates bytecode instructions that are non-specific to a particular computer architecture. Applicants also submit that APTE et al. discloses that a byte code is a machine independent code generated by the Java compiler and executed by a Java interpreter, and additionally, that bytecode instructions are designed to be easy to interpret on any computer and easily translated, on the fly into native machine code.

According to Applicants' independent claim 1, processing associated with storing the claimed designated plurality of images and the rendition time corresponding to each image in the storage is realized by converting the claimed predetermined codes into the claimed native codes executable by the processor and causing the processor to execute the native codes. Therefore,

the presently claimed invention achieves an advantageous effect of performing processing operations associated with selecting an image to be rendered at a high speed.

In contrast to the teachings of JUNG et al. and APTE et al. (and KIKUCHI et al.), Applicants' independent claim 1 recites including a native code for selecting an image to be rendered from among the plurality of images stored in the storage based on a specified location on a time axis relating to the playback timing of the video included in the control information, and the rendition time corresponding to each image stored in the storage, and storing the selected image in the image plane. Applicants respectfully submit that the combination of JUNG et al., KIKUCHI et al. and APTE et al. fail to disclose or render obvious at least the above-noted feature of Applicants' independent claim 1 insofar as the native code is pre-stored in the platform.

Accordingly, Applicants respectfully submit that the combination of JUNG et al., KIKUCHI et al. and APTE et al. fails to disclose or render obvious at least the claimed platform.

In view of the above, Applicants respectfully submit that independent claim 1 is allowable over the combination of JUNG et al., KIKUCHI et al. and APTE et al. as set forth by the Examiner.

In addition, Applicants respectfully submit that the method of independent claim 8 is allowable for reasons similar to those noted above with respect to independent claim 1, in addition to reasons related to its own recitations.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1 and 8 under 35 U.S.C. §103(a) as being unpatentable over JUNG et al., KIKUCHI et al. and APTE et al.

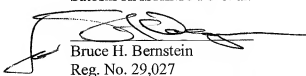
At least in view of the herein contained amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the outstanding rejection, together with an indication of the allowability of all pending claims, in due course. Such action is respectfully requested and is believed to be appropriate and proper.

Applicants note that this Response is being submitted after a Final Office Action has been mailed. Applicants recognize that Applicants cannot, as a matter of right, amend any finally rejected claims. However, Applicants also recognize that any amendment that will place the application either in condition for allowance or in better form for appeal may be entered. Applicants respectfully submit that entry and consideration of this Response, including amendments provided herein, is appropriate and timely.

Should an extension of time be necessary to maintain the pendency of this application, including any extensions of time required to place the application in condition for allowance by an Examiner's Amendment, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

Should the Examiner have any questions concerning this Response or the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,
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